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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

<p>CASEY BLOTZER, Individually, And) On Behalf Of All Others Similarly) Situated,) Plaintiff,) v.) AMERICAN EXPRESS COMPANY,) Defendant.)</p>	<p>Case No. 8:15-cv-01011-SJO-PLA JOINT STIPULATION OF DISMISSAL OF ACTION WITH PREJUDICE AS TO THE NAMED PLAINTIFF AND WITHOUT PREJUDICE AS TO THE PUTATIVE CLASS</p>
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NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

The notice and approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable to the parties' settlement and dismissal of this putative class action because this action has not been certified as a class.¹

¹ Federal Rule of Civil Procedure 23(e) states "[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court's approval.

1 The Parties agree that this Court can proceed to dismiss this Action entirely
2 with prejudice as to the Named Plaintiff and without prejudice as to the Putative
3 Class alleged in the complaint.

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5 Respectfully submitted this 9th day of December, 2015

6 By: s/Todd M. Friedman, Esq.
7 TODD M. FRIEDMAN
8 Attorney for Plaintiffs

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10 By: s/Marcos D. Sasso, Esq.
11 MARCOS D. SASSO
12 Attorneys for Defendant

1 Filed electronically on this 11th day of December, 2015, with:

2 United States District Court CM/ECF system

3 Notification sent electronically via the Court's ECF system to:

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5 Honorable S. James Otero
6 United States District Court
7 Central District of California

8 Marcos D. Sasso
9 Strook & Strook & Lavan LLP

10 This 11th day of December, 2015

11
12 s/Todd M. Friedman, Esq.
13 TODD M. FRIEDMAN